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[Your Name]

[Your Title]

[Your Company]

[Street Address, City, State ZIP]

May 14, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

**Re: U.S. Patent No. 10020919 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10020919 (the "10020919 Patent"). After preliminary review, we have substantial concerns about the validity, enforceability, and scope of the asserted claims, summarized below. We reserve all rights and defenses.

## **1. Subject Patent — Summary**

An analysis of United States Patent 10,020,919 reveals its significance in the field of wireless communications, particularly in the context of Wi-Fi technology. The patent has been the subject of notable litigation.

Patent Summary

- Title: Protection methods for wireless transmissions
- Assignee: The patent was originally assigned to Newracom Inc. and is currently assigned to Atlas Global Technologies LLC.
- Inventors: Dae Won Lee, Young Hoon Kwon, Yujin Noh, Sungho Moon, Ahmad Reza HEDAYAT.
- Filing Date: April 25, 2017
- Issue Date: July 10, 2018
- Abstract: The patent describes methods for protecting wireless transmissions in networks that use Multi-User Multiple-Input-Multiple-Output...

## **2. Validity Concerns under 35 U.S.C. § 102 — Prior Art**

We have identified prior-art references that, in our preliminary view, anticipate one or more asserted claims of the 10020919 Patent:

Analysis of Prior Art Cited in U.S. Patent 10,020,919

Under 35 U.S.C. § 102, a person shall be entitled to a patent unless the claimed invention was patented, described in a printed publication, or in public use, on sale, or otherwise available to the public before the effective filing date of the claimed invention. The priority date for US Patent 10,020,919 is October 12, 2015. Therefore, any reference published or filed before this date could potentially be considered prior art.

The following analysis details the prior art references cited by the examiner during the prosecution of the patent application.

U.S. Patent Documents

1. US Patent 9,674,833 B2

Publication Date: June 6, 2017 (Filed: April 1, 2015)

Assignee: Intel IP Corporation

Description: This patent, titled "Apparatus and method for multi-user uplink access," describes a method for an access point (AP) to transmit a trigger frame to multiple stations (STAs) to solicit uplink multi-user transmissions. The trigger frame includes resource unit allocation information. This is relevant to the coordination of multi-user...

#### **4. Litigation History of the Patent**

Public records reflect that the 10020919 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Atlas Global Technologies LLC v. Walmart Inc — 2:26-cv-00317 · Texas Eastern District Court · filed 2026-04-21 · Open
- Atlas Global Technologies LLC v. CommScope, Inc. et al. — 6:21-cv-00818 · U.S. District Court for the Western District of Texas · filed 2021-08-04 · Initial filing in litigation wave
- Atlas Global Technologies LLC v. Dell Technologies, Inc. — 6:21-cv-00820 · U.S. District Court for the Western District of Texas · filed 2021-08-04 · Active
- Atlas Global Technologies LLC v. Hewlett Packard Enterprise Company — 6:21-cv-01217 · U.S. District Court for the Western District of Texas · filed 2021-11-22 · Active
- Atlas Global Technologies LLC v. NETGEAR, Inc. — 2:21-cv-00304 · U.S. District Court for the Eastern District of Texas · filed 2021-08-11 · Active
- Atlas Global Technologies LLC v. TP-Link Technologies Co., Ltd., et al. — 2:21-cv-00430 · U.S. District Court for the Eastern District of Texas · filed 2021-11-15 · On appeal
- Atlas Global Technologies LLC v. Amazon.com, Inc. et al. — 2:22-cv-00103 · U.S. District Court for the Eastern District of Texas · filed 2022-03-28 · Active
- Atlas Global Technologies LLC v. Valve Corporation — 6:22-cv-00355 · U.S. District Court for the Western District of Texas · filed 2022-03-31 · Active
- ...and 1 additional case(s)

#### **4. Request**

In light of the foregoing, we request that your client (i) provide a detailed claim chart identifying each accused product or service and mapping every limitation of each asserted claim, (ii) identify any prior art known to your client, including any references cited during prosecution or reexamination, and (iii) substantiate the basis for any damages or licensing demand. We are

prepared to discuss the matter further once we have received and reviewed the foregoing.

Sincerely,

**[Your Name]**

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